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Managing Director
Sindh Public Procurement Regulatory Authority (SPPRA)
Karachi

**Subject: Comments for 47th Meeting of the Board of Directors of Sindh Public Procurement Regulatory Authority (SPPRA), held through circulation on 18th March 2026**

**Agenda Item No.1**

The draft procedure on treatment of abnormally high and low bids by the Public Private Partnership Unit, Finance Department, is in contravention to SPPRA Rules 2010. It will increase discretion of PPP Unit in determining "abnormally high or low" bids, which will lead to inconsistencies, disputes, and exclusion of competitive bids. In essence, fairness and transparency of the procurement process will be affected.

It may also be noted that the Public Private Partnership projects are based on financial models because the private sector has investment in these projects and the private sector takes loans from the banks. Therefore, the estimates keep changing based on market conditions.

It is proposed that the SPPRA Rules 2010 already provide a provision for the rejection of the bids. The procuring agency can reject higher bids at any time. For the bids which are lower than the estimated value, performance guarantee can be doubled to account for any risk.

Hence, I record my dissent regarding the proposed provision.

**Agenda Item No 2:**

The proposed mechanism of resolving tied bids through a draw/toss will discretion to the procuring agency, undermining transparency in the procurement process, and is in contravention of the SPPRA Rules, 2010. With e-procurement now mandatory for all procuring agencies, conducting an open auction among tied bidders would violate the provisions of EPADs.

It is proposed to invite a re-bid among the tied bidders and the contract can be awarded accordingly, rather than resorting to a draw/toss.

Hence, I record my dissent regarding the proposed provision.

Sincerely,

Kashif Ali
SPPRA Board Member
Executive Director
Transparency International Pakistan